

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

JOSE ORTIZ-PEREZ

CR. No. 05-cr-10115-JLT

**ASSENTED-TO MOTION TO EXTEND TIME TO FILE SUBSTANTIVE MOTIONS**

The defendant, Jose Ortiz-Perez, hereby moves to extend the time to file substantive motions for 10 days, to March 13, 2006. As grounds therefor, counsel states that he is in the process of reviewing the voluminous discovery in this case and intends to file motions to suppress, but needs the additional time requested to review the wiretap applications and affidavits in order to properly frame a motion to suppress wire interceptions.

The government assents to this motion.

Respectfully submitted,

/s David Duncan

David Duncan

(BBO #546121)

Zalkind, Rodriguez, Lunt & Duncan, LLP

65A Atlantic Avenue

Boston, MA 02110

(617) 742-6020

March 2, 2006

## Certificate of Service

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on the above date.

/s/ David Duncan